

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MCKENNA DUFFY and MICHAEL BRETT,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

YARDI SYSTEMS, INC., *et al.*,

Defendants.

Case No. 2:23-cv-01391

PRAECIPE TO AMEND PRO HAC  
VICE APPLICATIONS

TO: THE CLERK OF COURT

AND TO: ALL COUNSEL OF RECORD

On November 28, 2023, Lauren Norris Donohue and Derek A. Sutton of K&L Gates LLP submitted applications to appear pro hac vice on behalf of defendant R.D. Merrill Real Estate Holdings LLC. Dkt. Nos. 128, 129. The Court admitted Mr. Sutton and Ms. Donohue on November 29 and December 1, respectively. Dkt. Nos. 130, 133. Local counsel for Ms. Donohue and Mr. Sutton has withdrawn from this action. Dkt. No. 239. Attached as **Exhibits A and B** to this praecipe are amended Statements of Local Counsel for Ms. Donohue

1 and Mr. Sutton, respectively. Tyler K. Lichter of K&L Gates LLP shall serve as local counsel.  
2 Mr. Lichter entered his appearance in this action on November 27, 2023. Dkt. No. 123.

3  
4 DATED this 7th day of March, 2025.

5 K&L GATES LLP

6 By: s/ Tyler K. Lichter  
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14 Derek Sutton (*pro hac vice*)  
15 301 Hillsborough St., Ste. 1200  
16 Raleigh, NC 27603  
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Fax: (919) 516-2122  
Email: derek.sutton@klgates.com

17 *Attorneys for Defendant R.D. Merrill Real*  
18 *Estate Holdings, LLC*

# EXHIBIT A

**Pro Hac Vice Attorney**

Applicant's Name: Lauren Norris Donahue

Law Firm Name: K&L Gates LLP

Street Address 1: 70 W. Madison St., Suite 3100

Address Line 2: \_\_\_\_\_

City: Chicago State: IL Zip: 60602

Phone Number w/ Area Code 312.372.1121 Bar # 6294505 State IL

Primary E-mail Address: lauren.donahue@klgates.com  
*(Primary email address must be for the Pro Hac attorney and not a subordinate or staff member)*

Secondary E-mail Address: \_\_\_\_\_  
*(Additional contact email for questions during the application process)*

**STATEMENT OF LOCAL COUNSEL**

I am authorized and will be prepared to handle this matter, up to and including trial, in the event the applicant Lauren Norris Donahue is unable to be present upon any date assigned by the court.

Date: March 7, 2025 Signature of Local Counsel: s/ Tyler K. Lichter

Local Counsel's Name: Tyler K. Lichter

Law Firm Name: K&L Gates LLP

**Address must be within the geographical boundaries of the Western District of Washington per LCR 83.1(d)(2).**

Street Address 1: 925 Fourth Avenue, Suite 2900

Address Line 2: \_\_\_\_\_

City: Seattle State: WA Zip: 98104

Phone Number w/ Area Code 206-623-7580 Bar # 51090

# **EXHIBIT B**

**Pro Hac Vice Attorney**

Applicant's Name: Derek A. Sutton

Law Firm Name: K&L Gates LLP

Street Address 1: 301 Hillsborough Street, Suite 1200

Address Line 2: \_\_\_\_\_

City: Raleigh State: NC Zip: 27603

Phone Number w/ Area Code 919.743.7300 Bar # 58864 State NC

Primary E-mail Address: Derek.Sutton@klgates.com

*(Primary email address must be for the Pro Hac attorney and not a subordinate or staff member)*

Secondary E-mail Address: \_\_\_\_\_

*(Additional contact email for questions during the application process)*

**STATEMENT OF LOCAL COUNSEL**

I am authorized and will be prepared to handle this matter, up to and including trial, in the event the applicant Derek A. Sutton is unable to be present upon any date assigned by the court.

Date: March 7, 2025 Signature of Local Counsel: s/ Tyler K. Lichter

Local Counsel's Name: Tyler K. Lichter

Law Firm Name: K&L Gates LLP

**Address must be within the geographical boundaries of the Western District of Washington per LCR 83.1(d)(2).**

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